

*Southern Utah Wilderness Alliance v. U.S. Department of the Interior*  
Case No. 2:23-cv-00804-TC

**EXHIBIT 1** to SUWA's Reply in Support of Motion to Alter or Amend  
Judgment

Second Declaration of Ray Bloxham

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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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**SOUTHERN UTAH WILDERNESS  
ALLIANCE,**

Plaintiff,

v.

**UNITED STATES DEPARTMENT OF  
THE INTERIOR *et al.*,**

Defendants,

and,

**ANSCHUTZ EXPLORATION  
CORPORATION and STATE OF UTAH,**

Intervenor-Defendants.

**SECOND DECLARATION OF RAY  
BLOXHAM**

Case No. 2:23-cv-00804-TC-DBP

Judge Tena Campbell

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I, Ray Bloxham, declares as follows:

1. I previously filed a declaration in support of the Southern Utah Wilderness Alliance's ("SUWA") litigation in the above-captioned matter (ECF No. 64-1). This second declaration is provided in addition to my prior declaration and is filed in support of SUWA's Motion to Alter or Amend Judgment and Memorandum in Support (ECF No. 78).


2. I am familiar with and have reviewed the Drumlin Project environmental assessment, Finding of No Significant Impact, and decision record, including the maps and other information contained therein (*see, e.g.*, ECF No. 72-1).

3. I have obtained a Part 107 Remote Pilot certificate from the United States Federal

Aviation Administration (“FAA”), am current with all necessary FAA licensing requirements, have a Small Unmanaged Aircraft System Certificate of Registration, and have the training to safely fly and operate drones. I routinely fly drones to photograph and document public land resources and resource impacts in Utah, including the impacts associated with oil and natural gas exploration and development. I have documented resource impacts throughout Utah using drone technology, and have done so for several years.

4. On March 4, 2025, I visited the public lands in and around the Drumlin Project site. At the time, I observed active development of the site including large trucks traveling to/from the Drumlin Project site, the clearing and blading of the soil, and other exploration and development activities. On this visit, I flew a drone over the project site and took the photographs included in SUWA’s Reply in Support of Motion to Alter or Amend Judgment (ECF No. 80).

DATED: March 24, 2025

  
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Ray Bloxham